

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN THE MATTER OF THE SEARCH OF U.S.
POSTAL PRIORITY MAIL PARCEL BEARING
TRACKING NO. 9505 5142 4716 4281 6254 38

Case No. 2:24-mj-489

Filed Under Seal

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT**

I, Scott Emmick, Postal Inspector with the United States Postal Inspection Service, being duly sworn, depose and say as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application under Rule 41 of the Federal Rules of Criminal Procedure for a warrant to search the United States Postal Service Priority Mail parcel bearing Tracking Number 9505 5142 4716 4281 6254 38 (“SUBJECT PARCEL”), further described in Attachment A, for the things described in Attachment B. The SUBJECT PARCEL is currently located in the Southern District of Ohio, Eastern Division.

2. I am a United States Postal Inspector, having been so employed since July of 2023. I am presently assigned to the Columbus, Ohio Field Office, Pittsburgh Division of the United States Postal Inspection Service (“USPIS”). I have gained experience through completion of the Basic Inspector Training (“BIT”) in November of 2023. During BIT, I was instructed in all phases of criminal investigation, such as criminal law, search and seizure, field enforcement techniques, firearms proficiency, drug and narcotics identification, narcotics field testing, interviewing and evidence collection. Since November 2023, I have worked with various federal, state, and local law enforcement agencies in the investigation of crimes involving the U.S. Mail and the U.S. Postal Service, including but not limited to mail fraud, bank fraud, mail theft, burglaries, robberies, dangerous mail investigations, and mailed narcotics.

3. Prior to my employment with the USPIS, I was employed for five years by the Department of Homeland Security as a Border Patrol Agent in the Yuma, Arizona sector of operations. As a Border Patrol Agent, I served as a federal law enforcement officer enforcing crimes such as human smuggling and narcotics smuggling. I performed several duties such as a line agent, checkpoint operations, highway interdiction, and was a part of the movement coordination cell. I gathered intelligence by conducting traffic stops, interviewing suspected citizens and non-citizens involving numerous federal offenses, and actively patrolling the United States and Mexico border.

4. Experience and drug trafficking intelligence have demonstrated that Priority Mail and Priority Mail Express are commonly used to transport drugs and drug proceeds because of their reliability and the time pressures they place on law enforcement agents to execute a successful controlled delivery.

5. The facts set forth in this affidavit are based on my personal knowledge, knowledge obtained during my participation in this investigation, knowledge obtained from other individuals, review of records related to this investigation, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. This affidavit is made in support of a warrant to search the SUBJECT PARCEL for evidence of a crime as well as contraband, fruits of a crime, or other items illegally possessed, or property designed for use, intended for use, or used in committing a crime in relation to the following offenses:

- a. Distribution of and Possession with Intent to Distribute Controlled Substances, in violation of 21 U.S.C. § 841(a)(1);
- b. Use of a Communication Facility, in violation of 21 U.S.C. § 843(b); and
- c. Conspiracy to Possess with Intent to Distribute Controlled Substances, in violation of 21 U.S.C. § 846.

6. Because this affidavit is submitted for the limited purpose of establishing probable cause in support of the application for a search warrant, this affidavit does not set forth each and every fact learned by me during the course of this investigation.

SUBJECT PARCEL

7. On or about October 9, 2024, USPIS interdiction personnel in Columbus, Ohio, interdicted the SUBJECT PARCEL, addressed to “Jose Sanches, 2840 Clime Rd., Columbus, Ohio 43223,” with a return address of “Propel Print, 2513 E Gage Ave., Huntington Park, CA 90255.” The SUBJECT PARCEL is further described as a white United States Postal Service Medium Flat Rate Box. The SUBJECT PARCEL weighs 5lb 6.6ozs.

8. The SUBJECT PARCEL was mailed on October 7, 2024, from the Huntington Park Post Office, located at 6606 Seville Ave., Huntington Park, CA 90255, with \$19.30 of postage affixed to the parcel. The SUBJECT PARCEL is currently in the possession of the USPIS in Columbus, Ohio, in the Southern District of Ohio, Eastern Division.

PROBABLE CAUSE

9. I have learned through experience and training that drug traffickers frequently use Priority Mail services offered by the USPS to transport narcotics and drug proceeds. These services cost more because they are very timely, reliable, and trackable. However, due to the higher fee, these services are not typically used for personal mailings but rather are utilized by commercial mailers and business customers. As they are mostly used for commercial services, they are typically paid for using electronic postage or credit card as opposed to being paid for in cash. Because these services are reliable and trackable, they are often favored by persons who transport contraband and/or illegal controlled substances and drug proceeds. When used for illegal activity, these services are frequently paid for in cash. In my experience and through my training,

I know drug traffickers often pay for these services in cash so that the transaction cannot be traced to a particular credit card or business account, and because drug trafficking is often a cash-centric business. The SUBJECT PARCEL was paid for utilizing a cash transaction.

10. Among the characteristics of the drug profile possessed by the SUBJECT PARCEL is the “source state” origination of the parcel, as well as the destination of the SUBJECT PARCEL.

11. The origin state of the SUBJECT PARCEL bears on the issue of probable cause. U.S. Postal Inspectors, Special Agents of the Drug Enforcement Administration (“DEA”), and other intelligence sources have identified California as a source state for illegal drugs flowing into Central Ohio and a destination state for the proceeds from the sale of these illegal drugs. Based on my training and experience, I know drug traffickers frequently utilize various shipping and mail entities, including the United States Postal Service, for the shipment of controlled substances. Frequently the same shipping entity utilized for the shipment of controlled substances is also utilized for the shipment of the proceeds derived from the sale of these controlled substances.

12. On or about October 8, 2024, using images of the SUBJECT PARCEL that I obtained from USPS mail processing equipment, I conducted checks of USPS, law enforcement, and open-source electronic databases to determine the validity of the destination information contained on the SUBJECT PARCEL. The destination address, “2840 Clime Rd.” was found to be a valid and deliverable address in the 43223-zip code. The name “Jose Sanches” was not found to be associated with the address, however.

13. Further, on or about October 8, 2024, checks of USPS, law enforcement, and open-source electronic databases were conducted to determine the validity of the return information contained on the SUBJECT PARCEL. The return address, “2513 E Gage Ave.” was found to be

a valid and deliverable address in the 90255-zip code. The name “Propel Print” was found to be the current business associating with the address.

14. I know through training and experience that shippers of drugs and drug proceeds will often utilize a fictitious return name or no name with a non-valid return address, or sometimes even a legitimate business as in this case to reduce the possibility of identification and apprehension by law enforcement. Additionally, while a valid delivery address is necessary to ensure the delivery of a parcel, a fictitious delivery name or no name, is often utilized for the same reasons previously discussed.

15. On October 8, 2024, I used open-source electronic databases to conduct a search of the business “Propel Print” in the 90255-zip code. A telephone number was found associated with the business, and it was contacted. The individual at the location stated that they have been with the company for many years and was aware of the business operations. The individual also stated that they don’t often send parcels out of state and did not send anything resembling the SUBJECT PARCEL.

16. Additionally, the SUBJECT PARCEL was taped excessively on each seam of the exterior of the box. I have learned through experience and training that drug traffickers frequently use excessive tape on the exterior of the parcels, especially on the seams. This tactic is often used due to the belief that the odor of a controlled substance will not be expelled to the exterior of the parcels, limiting the possibility of detection by employees or drug detecting canines.

17. Because the SUBJECT PARCEL originated in California, a state known as a source of controlled substances being mailed to Central Ohio; because the destination name was unable to be associated with the addresses given; because the business listed as the sender was not aware of the SUBJECT PARCEL; because the SUBJECT PARCEL was paid for in cash; because

of the excessive taping, and because the SUBJECT PARCEL bore many similarities to other parcels believed to be associated and found to contain suspected controlled substances, investigators submitted the SUBJECT PARCEL for examination by a drug detecting canine.

EXAMINATION BY DRUG DETECTING CANINE

18. On or about October 9, 2024, U.S. Postal Inspectors contacted Officer Brian Carter, a member of the Columbus Division of Police K-9 Unit, who is the handler for “Odja,” a Drug Detecting Canine. K-9 “Odja” has been certified by the Ohio Peace Officers Training Association since April 2024 for drug detection, criminal apprehension, tracking, area and building searches, article searches, handler protection, and obedience. K-9 “Odja” has been trained and certified in the detection of cocaine, “crack,” heroin, methamphetamine, and their derivatives. K-9 “Odja” has had 200 hours of training at the *Gold Shield Training Kennels*, Pataskala, Ohio, a well-established and regarded training facility for police canines. Both in training and actual deployments, K-9 “Odja” has successfully detected narcotics by demonstrating clear, positive, aggressive alerts (scratch), and has established himself as a highly reliable police service dog.

18. The SUBJECT PARCEL was hidden among other boxes and USPS mail processing equipment, and K-9 “Odja” was allowed to search the entire area. Officer Carter concluded that K-9 “Odja” did alert positively to the SUBJECT PARCEL. Based on that alert, Officer Carter concluded that the odor of one or more of the drugs K-9 “Odja” is trained and certified to detect was present.

19. Based upon training and experience, I respectfully submit that the above information is indicative of drug trafficking activity, and that, based on the above, there is probable cause to search the SUBJECT PARCEL.

20. If the SUBJECT PARCEL is found to contain controlled substances, these controlled substances will be seized as part of an ongoing drug trafficking investigation.

CONCLUSION

21. Based upon the foregoing, I submit there is probable cause to search the SUBJECT PARCEL for controlled substances, drug proceeds, and other evidence of violations of 21 U.S.C. §§ 841(a)(1), 843(b), and 846.

22. WHEREFORE, I respectfully request that the Court issue a warrant authorizing agents of the USPIS, including but not limited to other law enforcement agents and technicians assisting in the above-described investigation, to open, view, photograph, and seize, if necessary, the SUBJECT PARCEL and its contents.

23. The above information is true and correct to the best of my knowledge, information, and belief.

Scott Emmick

Scott L. Emmick
U.S. Postal Inspector

Sworn and subscribed to me this 9 th day of October 2024

Chelsey M. Vascara
Chelsey M. Vascara
United States Magistrate Judge